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UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

In re VALEANT PHARMACEUTICALS)	Master No. 3:15-cv-07658-MAS-LHG
INTERNATIONAL, INC. SECURITIES)	
LITIGATION)	<u>CLASS ACTION</u>
_____)	
This Document Relates To:)	DECLARATION OF
)	CHRISTOPHER A. SEEGER IN
ALL ACTIONS.)	SUPPORT OF PLAINTIFFS'
)	OMNIBUS OPPOSITION TO
_____)	DEFENDANTS' MOTIONS TO
)	DISMISS

CHRISTOPHER A. SEEGER, under penalty of perjury, declares and certifies as follows:

1. I am a member of the law firm of Seeger Weiss LLP, attorneys for Lead Plaintiff Teachers Insurance and Annuity Association of America (“TIAA”) and named plaintiff City of Tucson together with and on behalf of the Tucson Supplemental Retirement System (“Tucson”) (collectively, “Plaintiffs”) in the above-captioned action. I am a member of the bar of the State of New Jersey, and I am admitted to practice before this Court.

2. I make this Declaration based on my personal knowledge in support of Plaintiffs’ Omnibus Opposition to Defendants’ Motions to Dismiss.

3. Attached as Exhibit A are excerpted pages of the Amended Counterclaims of Valeant and Pershing Square, *Allergan, Inc. v. Valeant Pharms. Int’l, Inc.*, No. 8:14-cv-01214-DOC-(ANx) (C.D. Cal. Nov. 3, 2014) (¶¶102, 109).

4. Attached as Exhibit B is a copy of *In re Am. Realty Capital Props., Inc. Litig.*, Summary Order Granting in Part and Denying in Part Defendants’ Motions to Dismiss the Second Amended Complaint, No. 1:15-mc-00040-AKH (S.D.N.Y Aug. 5, 2016) (Dkt. No. 290).

5. Attached as Exhibit C is an excerpted page of the March 2015 Debt Offering (p. 36).

In accordance with 28 U.S.C. §1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: November 14, 2016.

s/ Christopher A. Seeger
Christopher A. Seeger